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September 21, 2000

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Gibson:

This letter is in response to your letter of September 7, 2000, and a subsequent phone conversation with Neil Evans of your staff and the Burson-Marsteller/Young & Rubicam Political Action Committee's Assistant Treasurer, Ronna Sable Weber, on September 18, 2000.

Your letter directed our PAC to file our 1999 Year End Report electronically. However, as we have indicated in many conversations and correspondence with you, this is not possible. In 1999 we filed our reports with the FEC via a computer disk and hard copy of our report. At some point during 1999, the FEC contacted us and asked that we not include a disk in our filing as it was unnecessary. We complied with this request and continued to send a hard copy of our report to the FEC. We did not receive a password allowing us to electronically submit our reports via the Internet until the spring of 2000. In addition, we have made several amendments to our 1999 Year End Report and the electronic filing of those amendments was not possible without electronically filing several earlier reports as well which the FEC had received in hard copy paper form.

To apply the electronic filing requirement retroactively seems unreasonable, and we would hope our paper submission of the 1999 Year End Report and our commitment to file all reports in the future, is satisfactory.

~~We submitted our Second Quarterly Report electronically via the Internet this year and fully intend to submit all future reports electronically and to be in full compliance with the law. For the record, however, we have had, and continue to have, great difficulty getting through our corporate computer-system-firewall in order to comply with this mandate. We will make every best effort to remediate that issue and satisfy your desire and our commitment to file all future reports electronically.~~